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Of Attorneys for Defendant

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF OREGON**  
**PORTLAND DIVISION**

**THOMAS GLENN and PATSY  
McKINNEY,**

**11-CV-402-KI**

PLAINTIFFS,  
v.  
CITY OF PORTLAND, a public body,  
DEFENDANT.

**AFFIDAVIT OF WILLIAM W.  
MANLOVE (IN SUPPORT OF  
DEFENDANT'S RESPONSE TO  
MEMORANDUM OF LAW IN SUPPORT  
OF PLAINTIFFS' MOTION FOR  
PARTIAL SUMMARY JUDGMENT)**

STATE OF OREGON            )  
  ) ss.  
County of Multnomah        )

I, WILLIAM W. MANLOVE, being first duly sworn, depose and say:

1. I am a Senior Deputy City Attorney currently assigned to this lawsuit.
2. Attached to my affidavit as **Exhibit 1** are true and accurate copies of excerpts from the certified deposition transcript of Douglas Matthews.
3. Attached to my affidavit as **Exhibit 2** are true and accurate copies of excerpts from the certified deposition transcript of Freddie Jackson.

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RESPONSE TO MEMORANDUM OF LAW IN SUPPORT OF PLAINTIFFS'  
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PORTLAND CITY ATTORNEY'S OFFICE  
1221 SW 4TH AVENUE, RM 430  
PORTLAND, OREGON 97204  
(503) 823-4047

4. Attached to my affidavit as **Exhibit 3** are true and accurate copies of excerpts from the certified deposition transcript of Scott Montgomery.

5. Attached to my affidavit as **Exhibit 4** are true and accurate copies of excerpts from the certified deposition transcript of Thomas Glenn.

6. Attached to my affidavit as **Exhibit 5** is a true and accurate copy of the expert disclosure report of Phillip Zerzan, which was provided to plaintiffs' counsel on December 7, 2011 pursuant to the parties' mutually agreed upon disclosure date.

7. Attached to my affidavit as **Exhibit 6** are true and accurate copies of excerpts from the certified deposition transcript of Peter Sandrock.

8. Attached to my affidavit as **Exhibit 7** are true and accurate copies of excerpts from the certified deposition transcript of Kelly Van Blokland.

/s/ William W. Manlove  
WILLIAM W. MANLOVE

*SUBSCRIBED AND SWORN TO* before me this 13<sup>th</sup> day of January, 2012, by  
William W. Manlove.

Delphine Kennedy-Walker  
Notary Public for Oregon  
My commission expires: 9/21/15